

friend's radio show, former President Ronald Reagan's son, Michael Reagan's show, and in the *Post Herald*.<sup>7</sup> The *Post Herald* story has since been scrubbed.

60. Hagmann went on to make several outrageous and or false statements about Willott, with and without Willott appearing with him, on BTR's H&H Report as "W," the "Intelligence Insider," including, but not limited to that Willott was like or is the "real American James Bond," is like his "brother," a man of integrity, who Hagmann "trusted explicitly" would "take a bullet for," who was so trustworthy that if "[Willott] called [him] up and said, 'Look there is an alien invasion on the White House lawn, [Hagmann] wouldn't even have to turn on [his] TV,' [Hagmann] would believe him."

61. Among the copious claims, Hagmann also told BTR's audience was that Willott was a multi "millionaire," with an impressive well-connected rolodex, who played a leading role in taking down the former Soviet Union's ruble, and had insider access to something called "the silver code" supposedly affecting the economy.

62. Willott and Hagmann confirmed, flattered, and praised one another; other H&H Report's purported Christian regular guests, including Quayle. Whatever their true relationship was, it was not a typical journalist – source relationship, had been deliberately misrepresented, and concealed from the Plaintiff.

63. After trying to obtain explanations, retractions, proof, and or correction, for the NSA targeting allegation she had been assigned to report to no avail, when Plaintiff obtained evidence it was false, the Plaintiff corrected it, and apologized, like all journalists must do to

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<sup>7</sup> James Ring Adams, *American Spectator*, "The Final Crash of Larry Case: The demise of a wacky Little Rock private eye who used to spy on (and for) Bill Clinton and the Arkansas machine," March 1997, <http://www.unz.org/Pub/AmSpectator-1997mar-00040>. Also see: Wayne Willott misses Powerball prize, *Post Herald*, 2013, <http://post-herald.com/lottery/87485538/Wayne-Willott-Seattle-Washington-misses-payout.html/more/>

preserve the integrity of the press, and published Did Doug Hagmann make up his NSA allegation he asked me to report? at her website on October 8, 2014.

64. Falsely accusing the NSA of wrong doing or malfeasance, affects the public-at-large, correcting false allegations is in the public's interest, and also necessary to do for the sake of the innocent individuals who work at the NSA.

65. The Plaintiff reported two follow up articles over four months, when she obtained additional evidence Defendants' allegations were false. At no time, did any individual involved respond to the Plaintiff's requests for a statement, corrections, had any been necessary, or issue retractions and apologies.

66. Plaintiff had been living a journalist's nightmare since the summer of 2013, desired to have clean hands throughout her journalistic career, and has made every effort to undo, correct and apologize for relying on their misrepresentations, and for being deceived and exploited into reporting their false allegation at her expense.

67. On November 19, 2014, the same day when the Plaintiff reported a follow up correction article, Quayle held another fundraiser, seeking "tithes" and "offerings" to send to Hagmann's private company that was titled, Please consider standing with Doug Hagmann financially, as he has blessed us all with his radio program, published in all caps at stevequayle.com, reproduced herein duplicated without corrections.<sup>8</sup>

Brethren: If you listen to Doug's show for timely and pertinent info then you know, Doug has taken his stand for the Lord and for righteousness sake – With so many people not being able to find fellowship and certainly unable to find like minded individuals locally who even care to know what's going on, Doug's show provides us a regular meeting place, I believe in tithes and offerings and would ask that once again you support his efforts – The storehouse is where you get fed ! Doug has never once asked me to mention his financial support needs yet , I can sense it when his funds run low and this morning it was confirmed – For those of you who believe in tithes and offerings but haven't been able to tithe as your not in fellowship please consider

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<sup>8</sup> Quayle Alert, stevequayle.com, November 19, 2014.

this request –Please send your support today –The constant frustration of computer attacks, broadcast interruptions and hell’s messengers can get any one down –We have so little time left all all hell is breaking loose –Please help him today –,as you never know what guest or statement will help your unbelieving spouse or friends to get it! Thank you, Steve

**II. February 10, 2015 Defamatory *Per Se* Radio Broadcast. February 10, 2015 Libel *Per Se* Joint Statement**

68. On February 10, 2015, Hagmann and Quayle, in concert, manufactured another fear-based, false narrative, and defamed, threatened, and incited violence against the Plaintiff on H&H Report (“February 10 Radio Broadcast”) that was published, broadcast, controlled, monitored and transmitted on BTR, and their affiliated partner companies, licensees or assignees (such as ITunes) worldwide audiences to (1) demonize the Plaintiff; (2) falsely accuse her of serious crimes; (3) damage her income, reputation, and future work prospects; (4) falsely accuse her of being unchaste; (5) cause maximum damage, distress and anguish to the Plaintiff personally and professionally; (6) attempt to intimidate and bully the Plaintiff from exposing more about their grossly and or wholly misrepresented high-level “insider” sources true bona fides, expertise, and character and or additional false allegations or both; (7) deceive and elicit sympathy from their predominately Christian, Conservative and Patriotic trusting, loyal listeners and readers, while casting themselves as Christian blameless victims; (8) to continue to raise and or generate significant funds from ad revenue, and or the sales of merchandise, including, but not limited to, books, DVDs, prepper, doomsday survival gear, freeze dried food, and precious metals via interstate and international commerce using fear porn disguised as legitimate news; (9) and to continue seeking “tithes” and “offerings” to send to Hagmann’s private corporation.

69. During the 3-hour February 10 Radio Broadcast, approximately one third of the audio content was dedicated to, and focused on, defaming and inciting violence against the

Plaintiff, directly and indirectly, by falsely, and broadly associating her with another individual, Kirk Michael McLeod (“Michael McLeod”) who resides in New York State.

70. The February 10 Radio Broadcast was heard inside and outside of New York State, the United States, Canada and across the globe.

71. Beginning fourteen minutes into the February 10 Radio Broadcast, before directly naming the Plaintiff shortly thereafter, Quayle stated this about her below:<sup>9</sup>

**MR. QUAYLE:** And ladies and gentlemen, we have tried, as good stewards of the leading of the Lord of our lives, to do the best job we can do.

When people come against us using false names, when they come against us on false pretenses, when they accuse us of ‘ripping off the listeners,’ yet they set up their own vehicle under a false name, and then when multiple people have complaints and openly band together to openly say, “They are going to destroy me, or destroy Doug, or destroy *Hagmann and Hagmann*,” we’ve put up with it to the point, until we could no longer over look it, because I was getting emails constantly and consistently saying, “What’s going on?”

These are new Christians that don’t have discernment. These are people who are just coming to find Jesus, and I encourage all of you—you’ve heard me pray. You’ve heard David Lankford pray. You’ve heard us bring us before the throne. Each and every one of your lives, and yet we are accused of being frauds, hypocrites, every manner of evil. The point is it came time to draw the line, and we drew the line. You can go on Doug Hagmann’s site or stevequayle.com—Setting the Record Straight: Our Joint Response Addressing the Character Assassinations that are Underway.

72. In Quayle and Hagmann’s written statement, Setting the Record Straight: Our Joint Response Addressing the Character Assassinations that are Underway (“February 10 Joint Statement”) that was published on the Internet on February 10, 2015, they directly named the Plaintiff twenty-seven (27) times.<sup>10</sup> The February 10 Radio Broadcast and February 10 Joint Statement are accessible to the general public.

73. Quayle and Hagmann’s February 10 Joint Statement states in part below:

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<sup>9</sup> Hawk and Steve Quayle on H&H Report, February 10, 2015. Timestamp (14:50) and (38:41)

<sup>10</sup> Quayle and Hagmann, “Setting the Record Straight: Our Joint Response Addressing the Character Assassinations that are Underway,” February 10, 2015. Plaintiff initially read it at Hagmann’s website. She does not know if Quayle published it despite claiming he did. She did not see it at his website and seeks a copy of the publication.

**FEBRUARY 10 JOINT STATEMENT:** We issue this joint statement as obedient watchmen as referenced in chapter six of the Book of Jeremiah to address very slanderous and libelous public accusations that have been made against us by two individuals, Kirk [Michael] McLeod, using the fictitious name Michael Erevna, and Marinka Peschmann...

\* \* \*

As many readers and listeners know, we've been subjected to a well-coordinated and malicious campaign of slander and libel over the last several months by two individuals who we once trusted, generously provided airtime, financial support, and for whom we solicited the support of others. Both were introduced to us telephonically by third parties.

74. When Hagmann addressed this on the February 10 Radio Broadcast beginning at approximately 38:41 minutes, he addressed the Plaintiff directly, and said this in part below:

**MR. HAGMANN:** I just want to put this in context. For listeners just joining us, Steve Quayle is our guest of course, stevequayle.com. What we are talking about is this: for the last several months. Just for context here, for the last several months, we've been under just a vicious, vile attack.

It is by two individuals, one Marinka Peschmann, the second is Michael Erevna. His real name is Kirk [Michael] McLeod, although he had never disclosed that to us.

Now, here is the situation. We have both, Steve and I, have been the subject of threats, intimidation, harassment and I mean harassment.

Folks, what you read on the websites. What you read on the websites that are referenced in this article, are just the top portion of the iceberg. Understand that. The second thing that everyone needs to understand; the very people we allowed into our inner circle—just as perhaps you, ladies and gentleman may allow into your inner circle, have betrayed us.

For, well, for their own personal gain. Lies, upon lies, and how do you refute lies made up out of whole cloth? It is difficult, but I want to make one thing perfectly, and abundantly clear to everyone listening to this. The three thousand word article response that Steve and I crafted—and we agonized, and when Steve says we agonized, we agonized and we sought, we sought counsel—wise counsel, scriptural counsel, divine. We prayed. We prayed together. We prayed individually. We brought our families into this because our families have been threatened, have been directly involved in this to a degree.

Folks, you will never know because we will never disclose it, and when Steve says, death threats, house on – yes. He's not lying, and I've become emotional because...Folks, let me tell you something. You've got no idea. If you would have told me three years ago that we were going to walk into this vipers den, I probably would have had second thoughts about doing what we are doing right now, but now we are in too deep, and we've got a job to do. And dog gone it, we're going to finish it. We're going to see it right to the end, but I will say this: the three thousand words response on the internet from Steve and I, we can add

another 9000. Understand, we only released, our response, just enough to satisfy the vipers, the serpents, and those people who thrive on chaos and lies. I don't believe we have to. And I am going to tell you, as Steve's younger brother, and the emphasis there is younger, Steve. As Steve's younger brother, I will stand in front of him, beside him, behind him. And protect him, and his wife and his family because some of the horrendous things that I've seen. And that's only a small portion of what he has endured. Some of the—it's just incredible. It's not a threat. I'm not making a threat. I'm just saying that we have so much more information, and, lastly is this; Steve, thank you for being patient with me.

**The Fake Well-Coordinated and Malicious Campaign of Slander and Libel Against Quayle and Hagmann**

75. Quayle and Hagmann falsely accused the Plaintiff of being engaged "in a well-coordinated and malicious campaign of slander and libel with Kirk Michael McLeod," at different times, in the February 10 Joint Statement, and the February 10 Radio Broadcast, where Quayle expressly stated they had "banded together."

76. Upon information and belief, having had adverse past dealings with Hagmann and Quayle and writing about it, Michael McLeod learned about the Plaintiff's reporting from readers. The Plaintiff did not know Michael McLeod when he picked up the Plaintiff's second, follow up correction article on November 30, eleven (11) days after the Plaintiff published it, and wrote about it on his website.

77. During Quayle's first statement on the February 10, 2015 Radio Broadcast, initially addressing the Plaintiff as a part of "they," before directly naming her, Quayle deliberately made, and or implied, categorically false statements about her. Plaintiff does not use a false name. Upon information and belief, Michael McLeod, goes by his middle legal name, and uses a pseudonym last name at his website, Revelationnow.net.

78. The Plaintiff did not accuse Hagmann and Quayle of "ripping off" the listeners. Michael McLeod did, and he provided documentation to support his claim, and a cashed check

from Quayle, that showed Hagmann and Quayle lied when they falsely claimed they did not know Michael McLeod's legal last name.

79. Upon information and belief, Michael McLeod "is a writer, inventor, solutions architect and independent researcher of ancient civilizations, spirituality, mysticism, and Biblical teachings" and a computer programmer.

80. Moreover, the Plaintiff's corrective reporting for her third article had also been confirmed before the Plaintiff first spoke to Michael McLeod. Quayle and Hagmann inadvertently confirmed this fact, but twisted it into provably false statements, in their February 10 Joint Statement, by intentionally misrepresenting the Plaintiff's reporting regarding their false SWAT allegation they had claimed involved the DHS, to malign, disparage, demean and libel the Plaintiff. Quayle and Hagmann wrote and published this below in part:

**FEBRUARY 10 JOINT STATEMENT:** Unknown to Peschmann, however, is that the person she spoke with at the police department contacted Doug Hagmann within 5 minutes of Peschmann calling, to make him aware of the predisposition sensed during her inquiry. Perhaps Peschmann forgot that Doug Hagmann has been an investigator in the private sector for 30 years and knows the clerks and brass of the local police force well.

81. During the February 10 Radio Broadcast, and in their February 10 Joint Statement, Quayle and Hagmann with full, actual knowledge that it was false, *per se* defamed the Plaintiff by claiming they had provided financial support to the Plaintiff. Hagmann and Quayle did provide financial support to Michael McLeod, not the Plaintiff.

82. The Plaintiff submits by falsely broad-stroking, connecting and associating her actions with Michael McLeod's was specifically intended to deceptively enhance their outright falsities, and to add fuel to additional false statements, when, at different times, Quayle and Hagmann stated that the Plaintiff and Michael McLeod were "traitors," who were guilty of betrayal, to damage the Plaintiff for the unforeseeable future. Moreover neither Hagmann nor

Quayle provided any proof they provided financial support to the Plaintiff as none exists. Allegations or imputations injurious to an individual in their trade, business, or profession, are defamation *per se*. In such cases damages are presumed. See: Supreme Court, Appellate Division, 1st Department: *Glazier v. Harris*, 99 A.D.3d 403, 404 (1st Dep’t 2012) (slander per se); *Sandals Resorts Intl. Ltd. v Google, Inc.*, 86 A.D.3d 32, 39 (1st Dep’t 2011) (libel per se).

83. At different times, separately, in concert, and often acting as a false witness to each other’s false statements, during the February 10 Radio Broadcast, as cited above, Quayle and Hagmann knowingly make heinous, impossible to be true, categorically false statements that the Plaintiff was engaged in, and guilty of, crimes against them, and their families, including, but not limited to, making “threats,” “death threats,” “intimidation,” “harassment,” and of “stalking” them. Allegations or imputations of criminal activity are slander *per se*.

84. During the February 10 Radio Broadcast Hagmann, among his malicious, untruthful statements, also stated and or implied that “they,” as accusers,—the Plaintiff and Michael McLeod were “vipers,” and “Satan” “followers,” to defame and harm the Plaintiff, and dangerously dehumanize her to their predominately Christian trusting, loyal audience.

85. Hagmann also falsely stated during the February 10 Radio Broadcast that the Plaintiff “routinely lambastes believers with accusations” without citing examples because it is not true, and implied she is Satanic, as an “accuser of the brethren,” when he said this below:

**MR. HAGMANN:** Nothing in scripture allows for setting up websites for blogs or other mediums to publicly and routinely lambaste believers with accusations. That is the job of Satan and his followers. He is the father of lies, and "accuser of our brethren," which accused them before God, day and night. John 8:44. Revelation 12:10.

86. Quayle, during the February 10, 2015 radio broadcast, referred to the Plaintiff and Michael McLeod as “traitors,” “false accusers,” and “slithering snakes,” who were guilty of